

## **EXHIBIT A**

Louise F. Fitzgerald, pursuant to Fed. R. Civ. P.30(b)(2), shall produce the following documents and things at the deposition:

### **DEFINITIONS**

1. The terms “Plaintiff” refers to Plaintiff EEOC, or the other persons acting on their behalf, and Intervenor Melinda Huerta, or the other persons acting on her behalf.
2. The term “Defendant” refers to Defendant New Prime Inc., its agents, employees or other persons acting on its behalf.
3. “Document” or “documents” means any written, typed, printed, recorded or graphic matter, however produced or reproduced, of any type or description, regardless of origin or location, including without limitation all correspondence, records, tables, charts, analyses, graphs, schedules, reports, memoranda, notes, lists, calendar and diary entries, letter (sent or received), telegrams, telexes, facsimiles, message (including, but not limited to reports of telephone conversations and conferences), studies, books, periodicals, magazines, booklets, circulars, bulletins, instructions, papers, files, minutes, other communications (including but not limited to, inter and intra office communications), questionnaires, contracts, memoranda or agreements, assignments, licenses, ledgers, books of account, orders, invoices, statements bills, checks, vouchers, notebooks, receipts, acknowledgments, data processing cards, computer generated matter, photographs, photographic negatives, phonograph records, tape recordings, wire recordings, “E-Mail” or other electronically stored information, other mechanical recordings, transcripts or logs of any such recordings, all other data compilations from which information can be obtained, or translated if necessary, and any other tangible things of similar nature.

The term “Document” as defined herein, and requested herein, shall be construed to specifically include all electronic information and data maintained on computers, hard drives, discs, networks and/or shared drives. Any electronic documents or data produced pursuant to these requests shall be produced with all directory structures in the same form as the records were maintained.

**DOCUMENTS REQUESTED**

1. All data, exhibits and other documents that Louise F. Fitzgerald used or relied upon to form, summarize or support her opinion.
2. All documents relied upon by Louise F. Fitzgerald in preparing her report.
3. Louise F. Fitzgerald’s current curriculum vitae.
4. All publications authored by Louise F. Fitzgerald in the past ten years.
5. A list of all other cases in which, during the previous four years, Louise F. Fitzgerald testified as an expert at trial or by deposition.
6. Documents evidencing the compensation to be paid to Louise F. Fitzgerald for her study and testimony in this case.
7. All documents, including correspondence, notes or memoranda, that contain information, facts or data provided to Louise F. Fitzgerald, which were considered by her in forming her opinions.
8. All documents, including correspondence, notes or memoranda, that contain any assumptions provided to Louise F. Fitzgerald, which were considered by her in forming her opinions.
9. All documents prepared by Louise F. Fitzgerald that were utilized by Louise F. Fitzgerald in forming her opinions or in preparing her report.